UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

JEFFREY GADDY,)	
)	
Plaintiff,)	
)	
V.)	CIVIL ACTION FILE
)	NO. 1:14-cv-01928-WSD
AMERICAN INTERSTATE)	
INSURANCE COMPANY,)	
)	
Intervenor Plaintiff,)	
)	
V.)	
)	
TEREX CORPORATION and)	
TEREX SOUTH DAKOTA, INC.)	
)	
Defendants.)	

TEREX DEFENDANTS' MOTION TO CERTIFY QUESTIONS OF STATE LAW TO THE SUPREME COURT OF GEORGIA

COME NOW, Defendants Terex Corporation and Terex South Dakota, Inc. (collectively, the "Terex Defendants"), and hereby file their Motion to Certify Questions of State Law to the Supreme Court of Georgia. In support hereof, Terex Defendants rely on their Memorandum Of Law In Support, which is being filed contemporaneously herewith. Terex Defendants respectfully request that the Court GRANT their Motion and grant such further relief as the Court deems just and proper.

Respectfully submitted this 28th day of December, 2018.

WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC

By: /s/ Frederick N. Sager, Jr.

Frederick N. Sager, Jr.
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3344 Peachtree Road, NE, Suite 2400 Atlanta, Georgia 30326 404.876.2700 Office 404.875.9433 Facsimile rsager@wwhgd.com mjohnson@wwhgd.com dcooper@wwhgd.com RULE 7.1D CERTIFICATE OF TYPE, FORMAT AND FONT SIZE

Pursuant to Local Rule 7.1D of the United States District Court of the

Northern District of Georgia, the undersigned certifies that the foregoing

submission to the Court was computer-processed, double-spaced between lines,

and used Times New Roman font of 14 point size.

This 28th day of December, 2018.

By: /s/ Frederick N. Sager, Jr.

Frederick N. Sager, Jr. Georgia Bar No. 622070

rsager@wwhgd.com

Attorneys for Defendants Terex

Corporation and Terex South Dakota

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the within and foregoing on all parties in the foregoing matter via CM/ECF e-filing, to wit:

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This 28th day of December, 2018.

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